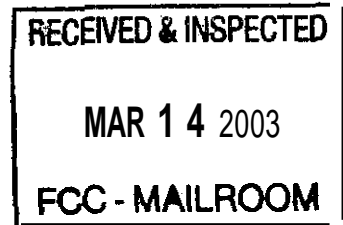


DOCKET FILE COPY ORIGINAL

David L. Wilner
P.O. Box 2340
Novato, CA 94948-2340
Tel.: 415-898-1200
Fax: 415-897-3489



March 12, 2003

VIA OVERNIGHT MAIL

Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Billed Entity Number: 144227
Form 471 Application Number: 263553
Funding Request No.: 723771
Funding Year 4: 07/01/2001 - 6/30/2002
Vendor: AT&T dba Teleport Communications Group (TCG) - Centrex Service

In the Matter of: Request for Review by Oakland Unified School District of Decision of
Universal Service Administrator Pursuant to Docket Nos. 96-45 and 97-21

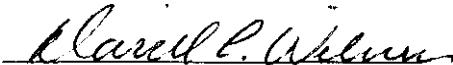
Dear Sir/Madam:

Enclosed please find the following for filing:

1. The request of the Oakland Unified School District for review of the USAC decision referenced herein.
2. Proof of service to show that the fund administrator has been sent a copy of the District's request for review via First Class Mail.

If you require anything further, please contact the undersigned. Thank you.

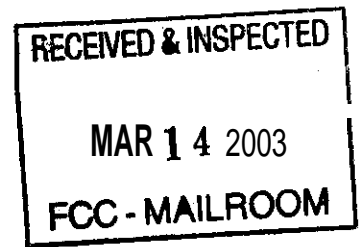
Sincerely,


David L. Wilner

No. of Copies rec'd 0
List ABCDE

DLW/mw

David L. Wilner
Representative for Oakland Unified School District
P.O. Box 2340
Novato, CA 94948-2340
Tel.: 415-898-1200
Fax: 415-897-3489
E-Mail: mawgrey@aol.com



March 12, 2003

VIA OVERNIGHT MAIL

Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Billed Entity Number: 144227
Form 471 Application Number: 263553
Funding Request No.: 723771
Funding Year 4: 07/01/2001 - 6/30/2002
Vendor: AT&T dba Teleport Communications Group (TCG) - Centrex Service

In the Matter of: Request for Review by Oakland Unified School District of Decision of
Universal Service Administrator Pursuant to Docket Nos. 96-45 and 97-21

APPEAL

Dear Sir/Madam:

The Oakland Unified School District ("District") respectfully requests review of the decision by USAC to deny funding to the District for Centrex service provided by AT&T (formerly Teleport Communications Group or TCG) (Exhibit 1). The Centrex is **used** by the District to provide local telephone service to teachers, administrators, and other employees supporting educational services District-wide. The District has approximately 54,000 students and 8,000 employees. The Centrex service is essential to the day-to-day operations of the District. The pre-discount cost for the Centrex service was \$536,755.44 for year 4 of the funding program. Because the District would receive a 76% discount on the Centrex service, the actual loss in funding for year 4 would be \$407,934.13.

GROUNDNS FOR REVIEW

1. Allowable Contract Date

According to the Administrator's Decision on Appeal, the District was denied funding because, among other things, "the Contract Award Date preceded the Allowable Contract Date" (Exhibit 1, p 3). The administrator's decision is erroneous. Prior to the PIA review described in the decision, the District was contacted by the SLD Client Service Bureau, and requested to correct the Contract Award Date to eliminate this problem. This occurred on 11/12/01 (see Exhibit 5 of the first appeal attached hereto as Exhibit 2). The District complied, and made the necessary change to the Form 471 on 11/19/01 (see Exhibit 6 of the first appeal attached hereto as Exhibit 2). Therefore, the Contract Award Date is not an issue. The District pointed this out on 6/14/02 when it appealed the first Funding Commitment Decision Letter in this matter (see Exhibit 7, p 2 of the first appeal attached hereto as Exhibit 2).

2. Establishing Form 470

According to the Administrator's Decision on Appeal, another reason the District was denied funding for the Centrex service was because the District failed to provide a copy of the Form 470 that established the service previously (Exhibit 1, p 3). The administrator's decision is also erroneous in this regard. This question was raised by PIA during its review, and the District responded by providing a copy of the Funding Synopsis for Application Number 00028494 showing that E-Rate discounts were approved for the service for the period 01/01/98 through 06/30/99, and a Funding Commitment Report for Application Number 0000154224 showing that the service was also funded for year 2 of the E-Rate Program (see Exhibit 1 of the first appeal attached hereto as Exhibit 2). The fact that the Centrex service was previously funded (which would require a Form 470 application) was verified by the District in its Grounds for Review of the first Funding Commitment Decision Letter denying funding (Exhibit 2, p 2).

3. Failure to Show Funding Request Improperly Denied

According to the Administrator's Decision on Appeal, another reason the District was denied funding for the Centrex service was because it failed to show that its funding request was improperly denied. The administrator's decision is erroneous. The District provided sufficient evidence at the time of the first appeal in this matter to show that it was entitled to funding for the Centrex service (Exhibit 2).

4. Financial Hardship

If funding is not granted in this matter, the loss to the District will be approximately \$407,934.13 for funding year 4. This comes at a time when the District is facing a financial crisis of major proportions and must layoff teachers and administrators as well as reduce expenses (see copy of Oakland Tribune story dated March 4, 2003 attached hereto as Exhibit 3). Under the circumstances, it would be unfair, unjust and unreasonable for USAC to deny funding for the District's basic telephone service.

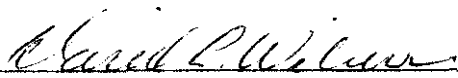
5. Public Policy

When Congress enacted the E-Rate program, the object **was** to provide financial assistance to qualified school districts for their telecommunications services. In this instance, the District is clearly entitled to such funding as a matter of public policy.

6. Conclusion

For the reasons stated above, the District's appeal should be granted.

Respectfully submitted,



David L. Wilner

Dated: March 12, 2003



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal - Funding Year 2001-2002

January 13, 2003

David A. Wilner
c/o Oakland Unified School District
Equitable Audit
PO Box 2340
Novato, CA 94948-2340

Re: Billed Entity Number: 144227
 411 Application Number: 263553
 Funding Request Number(s): 723748, 723158, 123761, 123711, 732555
 Your Correspondence Faxed: June 14, 2002

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your appeal of SLD's Year Four Funding Commitment Decision for the Application Number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 60-day time period for appealing this decision to the Federal Communications Commission ("FCC"). If your letter of appeal included more than one Application Number, please note that for each application for which an appeal is submitted, a separate letter is sent.

Funding Request Number: 723148
Decision on Appeal: **Approved, Funding Reduced**
Explanation:

- Your appeal has brought forward persuasive information that this funding request should be partially approved. Upon a thorough review of your appeal and the details to the file documented during initial review, it has been determined that PIA requested documentation to validate the eligibility of information as contained within your Item 21 documentation. Validation of the locations as requested was not provided after documented requests from PIA during initial review as detailed to the file. Your appeal has not shown that the eligibility of this portion of the funding request was provided during PIA review; therefore your funding request was modified accordingly

Funding Request Number: 723161
Decision on Appeal: **Approved, Funding Reduced**

Explanation:

- Your appeal has brought forward persuasive information that this funding request should be partially approved. Upon review of your appeal you were asked to provide eligibility validation of locations as contained within your Item **21** documentation. You conceded to the ineligibility of the locations questioned, and forwarded a revised phone bill, which was more representative of the actual monthly charges, as over billing for carrier line charges was evidenced in prior bills. Based on information provided upon appeal, your funding request was modified accordingly.

Funding Request Number: 732555

Decision on Appeal: **Approved, Funding Reduced**

Explanation:

- Your appeal has brought forward persuasive information that this funding request should be partially approved. Upon a thorough review of your appeal and the details to the file documented during initial review, it has been determined that PIA requested documentation to validate the eligibility of information as contained within your Item 21 documentation. Validation of the locations as requested was not provided after documented requests from PIA during initial review. Your appeal has not shown that the eligibility of this portion of the funding request was provided during **PIA** review; therefore funding request was modified accordingly.

Since the Administrator's Decision on Appeal approves additional funding for your application, SLD will issue a new Funding Commitment Decision Letter to you and to each service provider that will provide the services approved for discounts in this letter. SLD will issue the Funding Commitment Decision Letter to you as soon **as** possible. The Funding Commitment Decision Letter will inform you of the precise dollar value of your approved funding request. **As** you await the Funding Commitment Decision Letter, you may share this Administrator's Decision on Appeal with the relevant service provider(s). However, Forms 486 cannot be filed for the services covered by this appeal until you have received your new Funding Commitment Decision Letter.

Funding Request Number: 723758

Decision on Appeal: **Denied in full**

Explanation:

- Your correspondence appeals the Funding Commitment Decision denying this funding request for insufficient documentation as requested by PIA during initial review. You contend the funding request is for eligible services, that documentation was forwarded to validate the eligibility of the users, that the Funding Commitment Decision Letter is vague and ambiguous, and that the

district will suffer financial hardship and that funding these commitments is in the public interest.

- During appeal review, you were contacted and asked to provide additional documentation to validate the eligibility of the 413 users as indicated in your item 21 documentation. Correspondence was forwarded to your attention 10/21/02 regarding this FRN. In response you forwarded the same documentation provided to PIA during initial review. An additional correspondence was forwarded 10/31/02 requesting eligibility validation of the users for this service. After subsequent extensions were granted, you responded 11/22/02, yet failed to once again specifically detail the eligibility of the 413 users for this service. As the documentation provided was insufficient to validate the user eligibility for this funding request, your appeal is denied.

Funding Request Number: 723771
Decision on Appeal: **Denied in full**
Explanation:

- Your correspondence appeals the Funding Commitment Decision denying this funding request for insufficient documentation as requested by PIA during initial review. You contend that the funding request is for eligible services that were previously funded. Your appeal also states that a copy of the funding synopsis for year 1 was provided to PIA, in addition to vendor invoices. Additionally you state the Funding Commitment Decision Letter is vague and ambiguous, that the district will suffer financial hardship and that funding these commitments is in the public interest.
- Upon a thorough review of your appeal and the details to the file documented during PIA review, it was determined that PIA documented conversations explaining that the Contract Award Date preceded the Allowable Contract Date on 12/17/01 and 1/04/02. A fax requesting the same is also detailed on 12/18/01. A phone conversation on 1/18/02 followed by a fax requesting the 470 that established these services. Phone conversations are also documented on 2/07/02 and 2/13/02, which details all FRN's and exceptions were discussed as per the 1/18/02 fax. On 3/01/02 PIA documents another conversation requesting the establishing 470 as for these services, an Email was forwarded on this date. As no record exists that another Form 470 was provided, and the Form 470 cited for this FRN had a Contract Award Date that preceded the Allowable Contract Date the FRN was denied. Your appeal has not shown that this funding request was improperly denied, therefore your appeal is denied.

If you believe there is a basis for further examination of your application, you may file an appeal with the Federal Communications Commission (FCC) via United States Postal

Service: FCC, Office of the Secretary, 445-12th Street SW, Washington, DC 20554. If you are submitting your appeal to the FCC by other than United States Postal Service, check the SLD web site for more information. Please reference CC Docket **Nos. 96-45** and 97-21 on the first page of your appeal. **The FCC must RECEIVE your appeal WITHIN 60 DAYS OF THE ABOVE DATE ON THIS LETTER for your appeal to be filed in a timely fashion.** Further information and new options **for** filing an appeal directly with the FCC can be found **in** the “Appeals Procedure” posted in the Reference Area of the SLD web site, www.sl.universalservice.org.

We thank you for your continued support, patience, and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

David L. Wilner
Representative for Oakland Unified School District
P.O. Box 2340
Novato, CA 94948-2340
Tel.: 415-898-1200
Fax: 415-897-3489
E-Mail: mawgrey@aol.com

June 14,2002

VIA OVERNIGHT MAIL

Letter of Appeal
Schools and Libraries Division
Box 125 • Correspondence Unit
80 South Jefferson Road
Whippany, NJ 07981

Funding Request No.: 723761
Funding Commitment Decision Letter Date: April 19,2002
Applicant Name: Oakland Unified School District
Form 471 Application Number: 263553
Funding Year 4: 07/01/2001 - 6/30/2002
Billed Entity Number: 144227
Vendor: AT&T dba Teleport Communications Group (TCG) • Centrex Service
Pre-Discount Amount: \$536,755.44

APPEAL

Dear Sir/Madam:

The Oakland Unified School District ("District") hereby appeals the Funding Commitment Decision Letter denying funding for Centrex service provided by AT&T Local (formerly Teleport Communications Group or TCG). SLD alleges: ***"Applicant has not provided sufficient documentation to determine eligibility of this item."***

In January of this year, PIA requested the District to provide certain information concerning the application for funding. The District responded fully to each request, and provided sufficient documentation to show that the Centrex service is eligible for E-Rate discounts. In fact, the Centrex service is eligible for discounts pursuant to the Schools and Libraries Eligible Service List, and the District received discounts for the same service in previous years of the funding program.

GROUNDS FOR REVIEW

1. Eligible Service

The Centrex service is eligible pursuant to the Schools and Libraries Eligible Service List, page 3.

2. Service Previously Funded

The District received funding for the Centrex service in Years 1 and 2 of the E-Rate program (see Exhibit 1, SLD funding notification synopsis for Year 1, and Funding Commitment Decision Letter for Year 2). Funding was denied in Year 3 due to a contract date issue. The District appealed the decision, but the appeal was denied. This information was provided to PIA when it reviewed the District's application for funding (see Exhibit 2).

3. Eligible Schools

PIA requested documentation to show that Garfield and Woodland elementary schools were part of the District; the number of students at each school, **as** well as how many qualified for the free lunch program. The District provided information on the Woodland school to the first PIA reviewer (see Exhibit 3), and information on the Garfield school was provided to the second reviewer (see Exhibit 4). The information was included as part of the District's Form **471** filing for Year **4**.

4. Allowable Contract Date

Prior to the PIA review, the SLD Client Service Bureau contacted the District and requested corrections to the allowable contract dates on the Block 5 section of the Form **471**. It was noted that the contract award date came before the allowable contract date **as** shown on the Form **471**, which is a violation of SLD rules (see Exhibit 5). The District complied, and requested that the contract dates be corrected accordingly (see Exhibit 6).

However, PIA raised the same question concerning the allowable contract dates for the Form **471** as though the corrections had not been made, and requested a copy of the original Form **470** that established the Centrex service agreement. The District responded by providing a copy of the SLD funding notification synopsis for Year 1, and noted that the service was also funded in Year 2.

It should also be noted that a question was raised earlier by SLD concerning the number of months the District was entitled to receive funding for the service. This issue was resolved when the District confirmed in writing that there was an ongoing contract for the entire twelve month funding period, rather than seven months **as** indicated on the Form **471** (see Exhibit 7).

5. Vendor Invoices Provided

PIA requested copies of the monthly summary bills for June through December 2001, and January 2002. The District responded **by** providing the bills, and a summary to show the total the District paid for the Centrex service during the eight month period (Exhibit 8). The District also advised PIA that the cost for the service was underestimated due to a misunderstanding concerning application of the California Teleconnect Fund (CTF) discounts (see Exhibit 8, Item 3). PIA also requested a complete monthly bill for November 2001, and the District complied (see Appendix 1).

6. Decision Vague and Ambiguous

The Funding Commitment Decision Letter fails to explain in sufficient detail why the Centrex service is ineligible. The statement “*Insufficient documentation*” does not advise the District what documentation is lacking. Therefore, the District does not know exactly how to respond beyond the information already provided.

7. Financial Hardship


If funding is not granted, the loss to the District will be approximately **\$386,464**. This assumes that the District would qualify for **72%** of the pre-discount amount. Because the District has paid for the Centrex service without the benefit of the E-Rate discounts during Year **4**, it has been necessary to make up the loss by reducing or eliminating funding for other school programs.

8. Public Policy

When Congress enacted the E-Rate program, the object was to provide financial assistance to qualified school districts for their telecommunications services. In this instance, the Centrex service was funded in previous years, and the District budgeted accordingly for Year **4**. If the District fails to receive funding, it will be worse off than before it applied for the E-Rate subsidy. Clearly, this is not what Congress intended.

For the reasons stated above, the District’s appeal should be granted.

Respectfully submitted,



David L. Wilner

Dated: June **14,2002**

SLC Funding notification Synopsis for Application Number: 00028494

Funding Request Number: 00034659 Funding Status: Funded
SPIN: 143002665 Service Provider Name: Pacific Bell
Provider Contract Number: C
Services Ordered: Telc Svc(s)
Effective Date of Discount: 01/01/1998 Contract Expiration Date: 12/31/1999
Estimated Total Annual Pre-discount cost: \$253,530.00
Discount Percentage Approved by SLC: 80%
Funding Commitment Decision: \$202,824.00 - FRN approved; modified by SLC
Funding Commitment Decision Explanation: The shared discount was corrected.

Funding Request Number: 00034659 Funding Status: Funded
SPIN: 143000067 Service Provider Name: Teleport Communicati
Provider Contract Number: C
Services Ordered: Telc Svc(s)
Effective Date of Discount: 01/01/1998 Contract Expiration Date: 09/30/1999
Estimated Total Annual Pre-discount Cost: \$612,900.00
Discount Percentage Approved by SLC: 80%
Funding Commitment Decision: \$490,320.00 - FRN approved; modified by SLC
Funding Commitment Decision Explanation: The shared discount was corrected.
Funding Request Number: 00034682 Funding Status: Funded
SPIN: 143002858 Service Provider Name: BBN Telecom Inc.

Provider Contract Number: C
Services Ordered: Inet Acc(s)
Effective Date of Discount: 01/01/1998 Contract Expiration Date: 06/30/1998
Estimated Total Annual Pre-discount Cost: \$19,350.00
Discount Percentage Approved by SLC: 80%
Funding Commitment Decision: \$15,480.00 - FRN approved; modified by SLC
Funding Commitment Decision Explanation: The shared discount was corrected.

FUNDING COMMITMENT REPORT FOR APPLICATION NUMBER: 0000154224

Funding Request Number: 0000295954 Funding Status: Funded
SPIN: 143002665 Service Provider Name: Pacific Bell
Provider Contract Number: 9 A
Services Ordered: Telecommunications Services
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: 05/01/2005
Pre-discount Cost: \$274,200.00
Discount Percentage Approved by the SLD: 77%
Funding Commitment Decision: \$211,134.00 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The shared discount was corrected

Funding Request Number: 0000296912 Funding Status: Funded
SPIN: 143000067 Service Provider Name: Teleport Communications Group, Inc.
Provider Contract Number: C
Services Ordered: Telecommunications Services
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: 09/13/2002
Pre-discount cost: \$219,396.00
Discount Percentage Approved by the SLD: 77%
Funding Commitment Decision: \$168,934.92 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The shared discount was corrected

Funding Request Number: 0000296913 Funding Status: Funded
SPIN: 143002858 Service Provider Name: BBN Telecom Inc.
Provider Contract Number: C
Services Ordered: Internet Access
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: 1/31/2000
Pre-discount Cost: \$29,208.00
Discount Percentage Approved by the SLD: 77%
Funding Commitment Decision: \$16,164.06 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The shared discount was corrected

Funding Request Number: 0000296914 Funding Status: Funded
SPIN: 143018042 Service Provider Name: CRC Networks, Inc.
Provider Contract Number: C
Services Ordered: Internal Connection (Shared)
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: 03/31/2000
Pre-discount Cost: \$800,278.00
Discount Percentage Approved by the SLD: 77%
Funding Commitment Decision: \$16,214.06 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The shared discount was corrected

Funding Request Number: 0000296915 Funding Status: Funded
SPIN: 143004569 Service Provider Name: Government Computer Sales Inc.
Provider Contract Number: C
Services Ordered: Internal Connections (Shared)
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: 03/31/2000
Pre-discount Cost: \$940,473.00
Discount Percentage Approved by the SLD: 77%
Funding Commitment Decision: \$724,164.21 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The shared discount was corrected

Appeal
Schools & Libraries Corp
Box 125 Corbett Point ON17
100 - South Jefferson Ave
Wilmington, N.J. 07981

EQUITABLE AUDIT''

Exhibit 2

FAX

DATE: January 31,2002

TO: Daniel Incantalupo
USAC - SLD

FAX NO.: 913-599-6521

NO. OF PAGES: 33 (including this sheet)

FROM: David Wilner

Mr. Incantalupo - Attached are copies of the telephone bills you requested and a copy of the SLD Funding Notification Synopsis for funding year 1 (AT&T Local) referred to in our e-mail - DW.

1025 Second Avenue - Oakland, CA 94606
Direct (510) 879-8288 Fax (510) 879-1848

Oakland Unified School District
Technology Services

Fax

To: Mr. Daniel From: Max Mancub
Fax: (973) 599-6521 Date: 12/17/2001
Phone: _____ Pages: _____
Re: _____ CC: _____

☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

DATE 1/17/02

Per your request, I send you copy

of Refubensunt Form for Woodland

Elementary School.

Please feel free to call me for any further
questions you might have.

Sincerely,

Max Mancub

Fax sent Dec 17/2001
at 3:20 pm

CUSTOMER TOTALS

December 17, 2001 12:30PM

Site: Woodland 165

Customer Group: All (Active)

Sort By: Report Default

Site	Active Students				Free & Reduced	Adm	Denied	Direct Certified	Inactive
	Free	Redc.	Paid	Total					
61 Woodland 165	198	20	61	279	78.14%	17	19	50	59
Total:	198	20	61	279	78.14%	17	19	50	59

Post-It® Fax Note 7871		Date	12/17/01	Page 1
To	AT&T	From	RRD	
Co./Dept.	TS-04572	Co.	Red Server On	
Phone #		Phone #		
Fax #	1048	Fax #	1779	

'EQUITABLEAUDIT''**FAX**

DATE: February **26,2002**

TO: Robin Greateorex

NECA

FAX NO.: **973-884-8395**

NO. OF PAGES: 11 (including this sheet)

FROM: David Wilner

Robin - Attached is a list that identifies **85** school locations, along with the Billing Entity Number. We understand this document was attached to the District's Form **471** filing for year **4** funding. There are an additional **27** administrative lines for which we do not have the Billing Entity Number at this time. We have requested ~~this~~ information from the District.

As discussed, the ~~District~~ is in the process of filing a service substitution letter that will reduce the number of sites for the ~~data~~ service involved. We will forward a copy to you when it is mailed.

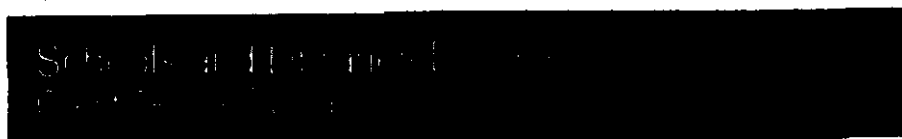
Lastly, we have asked the District to provide a copy of the Pacific Bell contract that it relies on for year **4** funding. We pointed out the difference in the Form **470** and **471** contract award ~~dates~~ and requested an explanation. We will respond with that information by the end of ~~this~~ week. In the meantime, if you have any questions, please call me directly on **415-898-1200**. Thank you - DW.

Copy: **M. Mansoubi**, OUSD

Oakland Unified School District

Free and Reduced as % of Enrolment

	School	# of Students	Free & Reduced	%	Discount %	Per
1	Malrose	482	446	93%	90%	433.8
2	Parker	509	469	92%	90%	458.1
3	Franklin	867	780	90%	90%	780.3
4	Lazear	463	406	88%	90%	416.7
5	Jefferson	1008	876	87%	90%	907.2
6	Highland	819	710	87%	90%	737.1
7	Bella Vista	743	642	86%	90%	668.7
8	Hoover	425	367	86%	90%	382.5
9	Webster	972	827	85%	90%	874.8
10	Garfield	931	790	85%	90%	837.9
11	Markham	632	531	84%	90%	568.8
12	LaEscuelita	309	257	83%	90%	278.1
13	Lincoln	629	500	79%	90%	568.1
14	Fruitvale	721	565	78%	90%	648.9
15	Hawthorne	1416	1103	78%	90%	1274.4
16	Stonehurst	771	600	78%	90%	693.9
17	Burbank	337	260	77%	90%	303.3
18	Woodland	256	197	77%	90%	230.4
19	Laurel	539	413	77%	90%	485.1
20	Longfellow	317	240	76%	90%	285.3
21	Lafayette	442	331	75%	80%	353.6
22	Toler Heights	135	98	73%	80%	108
23	Lowell (M)	663	475	72%	80%	530.4
24	Emerson	364	258	71%	80%	291.2
25	Prescott	640	448	70%	80%	512
26	Golden Gate	346	241	70%	80%	276.8
27	Madison (M)	553	385	70%	80%	442.4
28	Foster	398	277	70%	80%	318.4
29	Brookfield	612	425	69%	80%	489.6
30	Maxwell Park	502	346	69%	80%	401.6
31	Lockwood	872	601	69%	80%	697.6
32	M.L.King Jr	385	261	68%	80%	308
33	Cole	374	251	67%	80%	299.2
34	Westlake (M)	720	478	66%	80%	576
35	Washington	277	176	64%	80%	221.6
36	Marshall	197	125	63%	80%	157.6
37	Lakeview	392	242	62%	80%	313.6
38	Manzanita	919	545	59%	80%	735.2
39	Carter (M)	495	291	59%	80%	396



Help Line : (888) 203-8100
Fax: (888) 276-8736
E-Mail: slproblemresolution@ncs.com

Fax

To: Roger Clague
Fax: 1-510-879-1848
Phone: 1-510-879-8074
Re: Form 471= OUSD-A, case # 62015

From: Tye Eddings
Pages:
Date: 11/12/2001

☐ Urgent! ☐ For Review ☐ Please Comment ☐ Please Reply! ☐ Please Recycle

We are making this contact with you to obtain the necessary information to successfully data enter your Form 471 Services Ordered and Certification Form. Here is the information we need from you so that we may complete data entry of your application for E-Rate Discounts:

I am requesting corrections to your form 471 assigned the identifier OUSD-A for funding year 4. Corrections are needed in block 5, page 2, item 18. The Contract award date is before your allowable vendor / contract selection date. Please make the appropriate changes and fax them to the attention of Tye Eddings. If you have any questions feel free to give me a call. When calling in refer the operator to case number 62015.

We need to receive this information from you within 7 calendar days of this communication with you. If we do not receive the requested information from you within this time frame, your Form 471 application will be rejected and returned to you.

Thank You,
Tye Eddings
Client Service Bureau
SLD Problem Resolution
Phone 888-203-8100
Fax 888-276-8736

1025 Second Avenue - Oakland, CA 94606
Direct (510) 879-8288 Fax (510) 879-1848

Oakland Unified School District
Technology Services

Fax

To: Tye Eddings From: Roger Clague
Fax: 1-888-276-8736 Date: 11/12/2001
Phone: _____ Pages: 2
Re: _____ CC: _____

☒ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Message:

Please deliver to
TYE EDDINGS.

Thank you,

Roger Clague

Fax sent
on 11/19/2001
W

An. Tye Eddings
Fax # 1-888-276-8736
From: Roger Clague (CIO, Oakland Unified School District)

Re.
Entity #: 144227
Oakland Unified School District
Form 471, Year 4
AFI: OUSD-A
Case #: 62015
Block 5, Page 2, Item 18

Message:

Dear Tye,

Further to your fax dated 11/12/2001. The Block 5, page 2, Item 18 entry on our original OUSD-A 471 application erroneously reflected "Contract Award Date". Please make the following correction:

Block 5, Page 2, Item 18 "Contract Award date" is 1/12/2001 (January 12, 2001)

Please feel free to call back whenever you need further information.
Thank you.

Sincerely,

Roger Clague
Chief Information Officer

Att. Tye *Edings*

Fax# 1-888-276-8736

From: Roger Clague (Oakland Unified School District)

Message:

Dear Tye,

Further to our discussion of 11/02/01. The Block 5 entry on our original applications erroneously reflected the "end of pricing structure date". The contract will remain in force through 30/06/02. Full details are attached.

Please feel free to call back whenever you need further information regarding our OUSD-A and OUSD-B 471 applications for Year 4 Erate.

Thank you.

Sincerely,


Roger Clague

Chief Information Officer

Ref.
Entity number: 144227
~~Contact~~ person; Roger Clague
Oakland Unified ~~School District Form 471 Year 4~~ Erate Application
Applicant's ~~Form~~ Identifier: OUSD-A
Block 5, ~~page~~ 3 of 5
Category of ~~Service~~: Telecommunications Service
SPIN: 143000891
Item 20 ~~Contract~~ Expiration ~~Date~~

This is to ~~certify that~~ the date at Item 20 refers only to the end of the contracted pricing structure, while the service contract will remain in effect through 6/30/2002

Ref.
Entity number: 144227
~~Contact~~ person; Roger Clague
Oakland Unified School District ~~Form 471 Year 4~~ Erate Application
Applicant's ~~Form~~ Identifier: OUSD-A
Block 5, ~~page~~ 4 of 5
Category of Service: Telecommunications Service
SPIN: 143001192
Item 20 ~~Contract~~ Expiration Date

This is to ~~certify that~~ the date at Item 20 refers only to the end of the contracted pricing structure, while the service contract will remain in effect through 6/30/2002.

Ref.
Entity number: 144227
~~Contact~~ person; Roger Clague
Oakland Unified ~~School~~ District ~~Form 471 Year 4~~ Erate Application
Applicant's ~~Form~~ Identifier: OUSD-B
Block 5, ~~page~~ 2 of 2
Category of Service: Internet Access
SPIN: 143002858
Item 20: Contract Expiration ~~Date~~

This is to ~~certify that~~ the date at Item 20 refers only to the end of the contracted pricing structure, while the service contract will remain in effect through 6/30/2002.

November 2, 2001

Roger Clague
Chief Information Officer

Subj: Fwd: OUSD Response to Funding Year 4 Questions
Date: 1/31/2002 9:17:59 AM Pacific Standard Time
From: MAWGREY
To: Dincant@sl.universalservice.org
File: ousdCarrierBillingYr4.xls (15872 bytes) DL Time (52000 bps): 1 minute

Forwarded Message:

Subj: OUSD Responseto Funding Year 4 Questions
Date: 1/31/2002 9:12:05 AM Pacific Standard Time
From: MAWGREY
To: Dincant@unive@alservice.org
CC: tech-azar@ousd.k12.ca.us, mansoubi@ousd.k12.ca.us

Mr. Incantalupo - The following is in response to your questions and request for documents for funding year 4:

1. Telephone bills for FRNs **723771, 723761, 732555 and 723748** - We are sending you copies of the summary pages of the bills you requested via facsimile today. For your convenience, we have prepared a summary sheet that shows the average monthly bill for each FRN and the amount that was estimated (see attached).
2. You asked for a description of **112** remote sites described in the Block 4 funding request - **As** you will note on the summary sheet, the District is in the process of filing a Service Substitution Letter to reconfigure the service. Therefore, we do not have any bills to submit. (FRN **723748**.)
3. You inquired why the AT&T (Teleport) service funding request is approximately **\$10,000 more** per month than the service order supports - According to the attached spreadsheet, the District underestimated the cost for this service by more than **\$40,000** per month. (FRN **723771**.)
4. Pacific Bell data service (FRN **732555**) - According to the **spreadsheet**, the estimated **cost** is very close to the actual cost.
5. You asked if **47** locations were included in the request for the **frame** relay services (FRN **732555**) - No, they were not. However, certain of these locations would be eligible because they are for administrative services.
6. You had several questions concerning FRN **723771**: (a) **Why** is the amount stated on the service order form less than what is stated on the Form **4707** - The amount stated on the service order form is an estimate. If you look at the attached spreadsheet, you will **see** that the average monthly cost for this service for year 4 is **\$84,693.43**; (b) You asked if there were voicemail, **intercom** or directory listings included in the NBX charges - The answer is no; and (c) You requested the **470** that established the ATBT NBX service and the USCEN number from the **470** as well - We are sending you a copy of the funding synopsis for application **00028494** via facsimile (with the telephone bills). As you will note on the second page, the effective date of the contract was **01/01/98**. No USCEN number was noted in the **470** application for the funding year.
7. You asked if FRN **723758** is for cellular service - The answer is yes.

If you have any further questions, please contact me directly on **415-898-1200** or via the e-mail address above. Thank you.

Sincerely,

David L. Wilner
 Equitable Audit
 Novato, California

OAKLAND UNIFIED SCHOOL DISTRICT
YEAR 4 CARRIER BILLING (6/01/01 - 7/31/02)

AT&T Local (Formerly Teleport Communications Group or TCG) - FRN 723771

Block 5 Request
(Estimate)

<u>Date</u>	<u>Current Chgs.</u>	
01/01/02	\$99,199.38	
12/01/01	101,358.96	
11/01/01	104,375.14	
10/01/01	100,742.96	
09/01/01	94,673.13	
08/01/01	89,541.99	
07/01/01	14,765.23	
06/01/01	72,890.67	
	<u>\$677,547.46</u>	
	$+ 8 = \$84,693.43$ (average)	\$44,729.62 per month

- FRN 23761

12/28/01	\$4,479.03	
12/01/01	3,746.25	
11/01/01	3,279.21	
10/01/01	2,540.44 **	
09/01/01	1,997.87 **	
08/01/01	2,550.27 **	
07/01/01	3,704.82 **	
08/01/01	4,407.24	
	<u>\$26,705.13</u>	
	$+ 8 = \$3,338.14$ (average)	\$5,000.00 per month

Pacific Bell (Data) - FRN 732555

12/19/01	\$79,132.03	
11/19/01	62,354.43	
10/19/01	54,209.62	
09/19/01	54,004.03	
08/19/01	48,623.34	
07/19/01	61,504.72	
06/19/01	55,461.25	
	<u>\$415,289.42</u>	
	$+ 7 = \$59,327.06$ (average)	\$57,662.00 per month

Pacific Bell (ATM) - FRN 723748

OUSD is in the process of filing a Service Substitution Letter to reconfigure the data services that will be provided pursuant to this FRN. OUSD does not have any bills for this FRN.

*Bills received to date (as of 1/29/02).

**Summer vacation months. This bill is usually higher when school is in session and should average \$5,000 per month over the funding period.

EQUITABLE AUDIT''

FAX

DATE: January 31,2002

TO: Daniel Incantalupo
USAC - SLD

FAX NO.: 973-599-6521

NO. OF PAGES: 33 (including this sheet)

FROM: David Wilner

Mr. Incantalupo - Attached are copies of the telephone bills you requested and a copy of the SLD Funding Notification Synopsis for funding year 1 (AT&T Local) referred to in our e-mail - DW.

**AT&T**AT&T - Return Mail Center
P.O. Box 10077
MESA, AZ 85216-0077

Invoice

CUSTOMER COPY

ACCOUNT NUMBER:	OUSS -OUSS01
INVOICE DATE:	01/01/02
INVOICE NUMBER:	3902133
PAYMENT DUE:	\$ 753,020.16
PAYMENT DUE BY:	01/31/02

163-43.40-94033811,xrx
LYNN FORTALAZA
OAKLAND UNIFIED SCHOOL DISTRICT
LYNN FORTALAZA
RM 115C
1025 2ND AVE
OAKLAND CA 94606-2212
|||||

PLEASE SEND PAYMENT TO:

AT&T
P.O. BOX 10226
NEWARK, NJ 07193-0226

PREVIOUS BALANCE	\$ 458,464.69
PAYMENTS RECEIVED THROUGH 12/31/01	\$ 195,416.09
TOTAL PAST DUE	\$ 653,880.78
CURRENT CHARGES	\$ <u>99,130.38</u>
TOTAL AMOUNT DUE	\$ 753,020.16

FOR BILLING INQUIRIES CALL (888) 227-3824
FOR SERVICE INQUIRIES CALL (800) 820-1011



AT&T - Return Mail Center
P.O. Box 10077
MESA, AZ 85216-0077

Invoice

CUSTOMER COPY

ACCOUNT NUMBER: OUSS -OUSS01
INVOICE DATE: 12/01/01
INVOICE NUMBER: 3831314
PAYMENT DUE: \$ 458,464.69
PAYMENT DUE BY: 12/31/01

206-51.80-92814811.xrx
LYNN FORTALAZA
OAKLAND UNIFIED SCHOOL DISTRICT
LYNN FORTALAZA
RM 115C

1025 2ND AVE
OAKLAND CA 94606-2212



PLEASE SEND PAYMENT TO:

AT&T
P.O. BOX 10226
NEWARK, NJ 07193-0226

P.O.# 253169

PAYMENT APPROVED

BY Marie A. Walker, EQUITABLE
(CURRENT CHARGES ONLY) AUDIT

PREVIOUS BALANCE
PAYMENTS RECEIVED THROUGH 11/30/01

~~\$ 352,321.82~~
~~\$ 133,410.09~~ ✓

TOTAL PAST DUE
CURRENT CHARGES

PAY THIS AMT. ONLY

~~\$ 857,106.70~~
\$ 101,358.96

TOTAL AMOUNT DUE

~~\$ 458,464.69~~

NOTE: WE ARE REVIEWING THIS BILLING
WITH THE VENDOR AND WILL
ADVISE.

(MW)

FOR BILLING INQUIRIES CALL: (888) 227-3824
FOR SERVICE INQUIRIES CALL: (800) 829-1011



AT&T - Return Mail Center
P.O. Box 10077
MESA, AZ 85218-0077

Invoice

10/01

CUSTOMER COPY

ACCOUNT NUMBER: OUSS -OUSS01

INVOICE DATE: 11/01/01

INVOICE NUMBER: 3761382

PAYMENT DUE: \$552,521.82

PAYMENT DUE BY: 11/30/01

302-49.00-91585T11.xrx
LYNN FORTALAZA
OAKLAND UNIFIED SCHOOL DISTRICT
LYNN FORTALAZA
RM 115C
1025 2ND AVE
OAKLAND CA 94606-2212

P.O.# 253169

PLEASE SEND PAYMENT TO:

AT&T
P.O. BOX 10226
NEWARK, NJ 07193-0226

PAYMENT APPROVED

BY Maria G. Wilmer EQUITABLE AUDIT
(CURRENT CHARGES ONLY)

PREVIOUS BALANCE
PAYMENTS RECEIVED THROUGH 10/31/01

~~\$ 448,146.68~~
\$ 0.00

TOTAL PAST DUE
CURRENT CHARGES

PAY THIS AMT. ONLY →
~~\$ 448,146.68~~
\$ 104,375.14

TOTAL AMOUNT DUE

~~\$ 552,521.82~~

NOTE: WE ARE REVIEWING THIS BILLING
WITH THE VENDOR AND WILL
ADVISE.

MW

FOR BILLING INQUIRIES CALL: (888) 227-3824
FOR SERVICE INQUIRIES CALL: (800) 829-1011



Invoice

CUSTOMER COPY

ACCOUNT NUMBER: OUSS -OUSS01

INVOICE DATE 10/01/01

INVOICE NUMBER: 3692635

PAYMENT DUE: \$ 448,146.68

PAYMENT DUE BY 10/31/01

ATTENTION: LYNN FORTALAZA

OAKLAND UNIFIED SCHOOL DISTRICT
LYNN FORTALAZA
RM 115C

1025 2ND AVE
OAKLAND, CA 94606



P.O.# 253169

PLEASE SEND PAYMENT TO:

P.O. BOX 10226
NEWARK, NJ 07193-0226

PAYMENT APPROVED

BY *PAUL G. 11:21 AM* *EQUITABLE AUDIT*
(CURRENT CHARGES ONLY)

PREVIOUS BALANCE

~~\$ 347,403.72~~

PAYMENTS RECEIVED THROUGH 09/30/01

\$ 0.00

TOTAL PAST DUE

~~\$ 347,403.72~~

CURRENT CHARGES

PAY THIS AMT. ONLY →

~~\$ 100,742.96~~

TOTAL AMOUNT DUE

~~\$ 448,146.68~~

*WE ARE REVIEWING THIS BILLING
WITH THE VENDOR AND WILL
ADVISE.*

(M)

10, 11, 54 6 92 100
OCT 26
OAKLAND
PUBLIC SCHOOLS
ACCOUNTS

FOR BILLING INQUIRIES CALL: (888) 227-3824
FOR SERVICE INQUIRIES CALL (800) 829-1011



Invoice

CUSTOMER COPY

ACCOUNTNUMBER: OUSS -OUSS01

INVOICE DATE 09/01/01

INVOICE NUMBER 3624511

PAYMENT DUE \$347,403.72

PAYMENT DUE BY 09/30/01

P.O. # 253169

ATTENTION: LYNN FORTALAZA

OAKLAND UNIFIED SCHOOL DISTRICT
LYNN FORTALAZA

RM 115C
1025 2ND AVE
OAKLAND, CA 94606



PLEASE SEND PAYMENT TO:

AT&T
P.O. BOX 10226
NEWARK, NJ 07193-0226

PAYMENT APPROVED

BY

PREVIOUS BALANCE
PAYMENTS RECEIVED THROUGH 08/31/01
DEBITS THROUGH 08/31/01

\$ 252,730.59 *paid*
\$ 92,005.41
\$ 92,005.41

TOTAL PAST DUE
CURRENT CHARGES

✓ ✓ \$ 252,730.59
\$ 94,673.13

TOTAL AMOUNT DUE

\$ 347,403.72

FOR BILLING INQUIRIES CALL: (888) 227-3824
FOR SERVICE INQUIRIES CALL: (800) 829-1011



Invoice

CUSTOMER COPY

ACCOUNT NUMBER: OUSS -OUSS01

INVOICE DATE: 08/01/01

INVOICE NUMBER: 3557198

PAYMENT DUE 730.59

PAYMENT DUE BY: 08/31/01

P.O. #

ATTENTION: ACCOUNTS PAYABLE

OAKLAND UNIFIED SCHOOL DISTRICT

ACCTSPAYABLE

RM 115C

10252ND AVE

OAKLAND, CA 94606



PLEASE SEND PAYMENT TO:

AT&T

P.O. BOX 10226

NEWARK, NJ 07193-0226

AUGUST

PAYMENT APPROVED

BY

PREVIOUS BALANCE

\$ 163,188.60

PAYMENTS RECEIVED THROUGH 07/31/01

\$ 0.00

TOTAL PAST DUE

\$ 163,188.60

CURRENT CHARGES

\$ 89,541.99

TOTAL AMOUNT DUE

\$ 252,730.59

New Year
(01-02)

P.O. #

Reg # 283797

FOR BILLING INQUIRIES CALL: (888) 227-3824

FOR SERVICE INQUIRIES CALL: (800) 829-1011

P.O.#

PAYMENT APPROVED

BY

Invoice

CUSTOMER COPY

ACCOUNT NUMBER: OUSS -OUSS01

INVOICE DATE: 07/01/01

INVOICE NUMBER. 3490651

PAYMENT DUE: \$ 163,188.60

PAYMENT DUE BY: 07/31/01

ATTENTION: ACCOUNTS PAYABLE

OAKLAND UNIFIED SCHOOL DISTRICT
ACCTS PAYABLE

RM115C
1025 2ND AVE
OAKLAND, CA 94606



PLEASE SEND PAYMENT TO:

ATBT

P.O. BOX 10226

NEWARK, NJ 07193-0226

PREVIOUS BALANCE	\$	177,953.83
PAYMENTS RECEIVED THROUGH 06/30/01	\$	0.00

TOTAL PAST DUE	\$	177,953.83
CURRENT CHARGES	\$	14,765.23-

TOTAL AMOUNT DUE	\$	175.69721
------------------	----	-----------

New year:
(01-02)
P.O.#
Reg # 203797

FOR BILLING INQUIRIES CALL (888) 227-3624
FOR SERVICE INQUIRIES CALL: (800) 829-1011

P.O. #

PAYMENT APPROVED

BY

PLEASE SEND PAYMENT TO:

AT&T
P.O. BOX 10226
NEWARK, NJ 07193-0226
|||||

Invoice

REMITTANCE COPY

ACCOUNT NUMBER: OUSS -OUSS01

INVOICE DATE: 06/01/01

INVOICE NUMBER: 3424851

PAYMENT DUE: \$177,953.83

PAYMENT DUE BY: 06/30/01

AMOUNT ENCLOSED:

June

ATTENTION: ACCOUNTS PAYABLE

OAKLAND UNIFIED SCHOOL DISTRICT
ACCTS PAYABLE
RM 115C
1025 2ND AVE
OAKLAND, CA 94606

PREVIOUS BALANCE
PAYMENTS RECEIVED THROUGH 05/31/01
DEBITS THROUGH 05/31/01

\$ 253,598.50
\$ 236,006.24-
\$ 87,470.90

TOTAL PAST DUE
CURRENT CHARGES

\$ 105,063.16
\$ 72,890.67

*Non-Geo
(01-02)*

TOTAL AMOUNT DUE

\$ 109,572.02

*P.O. #
Ref. # 20379*

FOR BILLING INQUIRIES CALL (888) 227-3824
FOR SERVICE INQUIRIES CALL (800) 829-1011

REMITTANCE COPY

Oakland Tribune

District OKs teacher layoffs

Oakland school board's decision to cut \$11.2 million could eliminate 135 positions

By Alex Kah
STAFF WRITER

Tuesday, March 04, 2003 - OAKLAND — The school board approved \$17.2 million in cuts Monday to help balance next year's budget and get control of a chronic overspending problem.

The budget cuts translate into about 150 jobs -- most of them teaching positions-- although no individual employees were laid off Monday.

The school district is looking to eliminate 400 to 500 jobs to correct a mounting deficit and avoid a state takeover. A report by outside school budget experts wndudes Oakland has more than 500 employees it cannot afford -- and has far more teachers on the payroll relative to three other similar, urban districts.

District leaders hope to chop \$50 million to \$60 million from the \$280 million general fund next year, a move that some board members and teachers worry would be too much for the school system to bear.

The major cut approved Monday will eliminate \$0 million in teaching positions -- about 135 jobs -- by making sure all classes are fully enrolled. The district can have 20 students per teacher in kindergarten through third grade and 32 students per teacher in higher grades, although classes are usually smaller.

Some teachers supported the idea.

"You walk into any high school class and there's never more than 25 kids in there," said Kaiser Elementary first-grade teacher Janan Apaydin. "It's better to have smaller class sizes. but if (the money) is not coming from the state, we can't afford it."

But teachers' union leader and Oakland High teacher Ben Visnick said larger classes would cause parents to opt out of the district.

"In the long run, it's going to cost the district money because parents are going to leave," Visnick said.

Many teachers' union leaders at the board meeting routinely tried to shout down board members. They were repeatedly admonished for speaking out of turn.

Other cuts approved by the board would eliminate 19 assistant principals, saving \$1.5 million

Retirements help

A \$900,000 hit to the Early Childhood Education Program approved Monday will not affect the program's centers, director Dolores Ward told the board. Most of the money will be saved when six administrators retire this year, Ward said.

Another \$630,000 cut would eliminate about eight positions for teachers on special assignment.

The board also passed cuts to the central administration, which Superintendent Dennis Chaconas has already trimmed by 50 percent since he took over the district in 2000. On Monday the board cut 22 percent of what's left, to the tune of \$1.6 million. That figure includes salaries of the district's executive directors, who oversee school principals. It also comprises a \$250,000 reduction in the superintendent's budget and the elimination of the public relations office.

Board members and teachers are hoping that a few hundred of the position cuts come in the form of retirements, resignations and terminations. The rest would come from layoffs.

Under state law, employees to be laid off must be informed in writing by March 15. Some board members say they hope to

send out 800 to 1,000 letters by then to warn employees they may be laid off or moved to a new position.

\$63 million must go

Because of declining enrollment, rising costs and an ongoing deficit, the district has to cut \$63 million to balance the 2003-04 budget. That is not including an expected loss of revenue due to education funding cuts in Sacramento.

"If we could get through this without layoffs – through attrition or an early retirement (program) – nobody would be happier than this board," board member Dan Siegel said.

PROOF OF SERVICE BY MAIL

I, Marie A. Wilner, certify that the following is true and correct:

I am a citizen of the United States, State of California, am over eighteen years of age, and am not a party to the within cause.

My business address is P.O. Box 2340, Novato, California, 94948-2340.

On March 12, 2003, I deposited a true copy of the foregoing REQUEST FOR REVIEW BY OAKLAND UNIFIED SCHOOL DISTRICT OF DECISION OF UNIVERSAL SERVICE ADMINISTRATOR PURSUANT TO FCC DOCKET NOS. 96-45 AND 97-21 in a sealed envelope with first class postage thereof fully prepaid in a mailbox regularly maintained by the United States Government in the City of Novato, California, addressed to the following:

Administrator
Schools and Libraries Division
Universal Service Administrative Company
Box 125 - Correspondence Unit
80 South Jefferson Road
Whippany, NJ 07981

I declare under penalty of perjury under the laws of the United State that the foregoing is true and correct.

Dated this 12th day of March 2003, at Novato, California.

By: Marie A. Wilner
Marie A. Wilner